## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:

ROY GREEN, et al. v. ARIZONA CARDINALS FOOTBALL CLUB LLC, corporate successor

FOOTBALL CLUB LLC, corporate successo of ST. LOUIS CARDINALS, INC.

Hon. Anita B. Brody

No. 1422-CC00005-01, Circuit Court of St. Louis City, State of Missouri

## MOTION TO INTERVENE BROUGHT BY ARIZONA CARDINALS FOOTBALL CLUB LLC

Pursuant to Federal Rule of Civil Procedure 24(b), and for the reasons set forth in the accompanying Memorandum of Law, the Arizona Cardinals Football Club LLC, corporate successor of St. Louis Football Cardinals, Inc. (the "Cardinals"), respectfully moves for permissive intervention in MDL No. 2323 for the limited purpose of joining in and adopting the Response of the National Football League and NFL Properties LLC in Opposition to the Motion by Roy Green, *et al.* for Relief from the Stay and Injunction as it Applies to *Green v. Arizona Cardinals Football Club LLC* (the "NFL Response") (Doc. 6117).

WHEREFORE, for the reasons stated above and in the attached NFL Response, the Arizona Cardinals Football Club LLC respectfully requests that this Court enter an order granting it leave to intervene in MDL No. 2323 to respectfully join in and adopt the NFL Response seeking denial of the motion by the *Green* Plaintiffs.

Dated: August 1, 2014 Respectfully submitted,

/s/ Brad S. Karp

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## Certificate of Service

On August 1, 2014, I electronically filed a copy of the foregoing document through the CM/ECF system for the United States District Court for the Eastern District of Pennsylvania, which will send a notice of electronic filing to all counsel of record and make it available for viewing and downloading from the CM/ECF system.

/s/ Brad S. Karp \_\_\_\_\_ Brad S. Karp